

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in the U.S.
DISTRICT COURT at Seattle, Washington.

March 26 20 25
Ravi Subramanian, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

UNITED STATES OF AMERICA,
Plaintiff

v.

JEFFREY FABIANI,
Defendant.

NO. **CR 25 - 5077 DGE**

INDICTMENT

The Grand Jury charges that:

COUNT 1

(Attempted Production of Child Pornography)

Between in or about 2023 and in or about 2024, in Pierce County, within the Western District of Washington and elsewhere, JEFFREY FABIANI attempted to employ, use, persuade, induce, entice, and coerce a minor to engage in any sexually explicit conduct for the purpose of producing any visual depiction of such conduct and for the purpose of transmitting a live visual depiction of such conduct, knowing and having reason to know that such visual depiction will be transported and transmitted using any means and facility of interstate and foreign commerce and in and affecting

1 interstate and foreign commerce and mailed, such visual depiction was produced and
2 transmitted using materials that have been mailed, shipped, and transported in and
3 affecting interstate and foreign commerce by any means, including by computer, and
4 such visual depiction has actually been transported and transmitted using any means and
5 facility of interstate and foreign commerce and in and affecting interstate and foreign
6 commerce and mailed.

7 All in violation of Title 18, United States Code, Sections 2251(a) and 2251(e).

8 **COUNT 2**

9 **(Possession of Child Pornography)**

10 Between not later than in or about March 2022 and in or about March 2025, in
11 Pierce County, within the Western District of Washington, and elsewhere, JEFFREY
12 FABIANI knowingly possessed matter that contained any visual depiction, the
13 production of which involved the use of a minor engaging in sexually explicit conduct
14 and such visual depiction was of such conduct, that was mailed and shipped and
15 transported using any means and facility of interstate and foreign commerce and in and
16 affecting interstate and foreign commerce and that was produced using materials that had
17 been so mailed and shipped and transported by any means, including by computer, and
18 any visual depiction involved in the offense involved a prepubescent minor and a minor
19 who had not attained 12 years of age.

20 All in violation of Title 18, United States Code, Sections 2252(a)(4)(B) and
21 2252(b)(2).

22 **FORFEITURE ALLEGATION**

23 The allegations contained in Counts 1 and 2 of this Indictment are hereby
24 realleged and incorporated by reference for the purpose of alleging forfeiture. Upon
25 conviction of an offense alleged in Counts 1 and 2, JEFFREY FABIANI shall forfeit to
26 the United States, pursuant to Title 18, United States Code, Section 2253(a), all property
27

1 used to commit or to facilitate commission of the offenses, any proceeds of the offense,
2 and any data files consisting of or containing visual depictions within the meaning of
3 Title 18, United States Code, Section 2253(a)(1).

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1 **Substitute Assets.** If any of the above-described forfeitable property, as a result of
2 any act or omission of the defendant,

- 3 a. cannot be located upon the exercise of due diligence;
4 b. has been transferred or sold to, or deposited with, a third party;
5 c. has been placed beyond the jurisdiction of the Court;
6 d. has been substantially diminished in value; or,
7 e. has been commingled with other property which cannot be divided
8 without difficulty,

9 it is the intent of the United States to seek the forfeiture of any other property of the
10 defendant, up to the value of the above-described forfeitable property, pursuant to
11 Title 21, United States Code, Section 853(p).


12
13 A TRUE BILL:

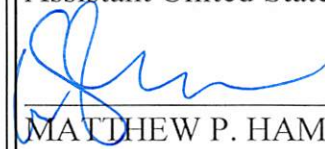
14 DATED: 3/26/2025

15 *Signature of Foreperson redacted pursuant*
16 *to the policy of the Judicial Conference of*
17 *the United States.*

18 _____
19 FOREPERSON

20 
21 TEAL LUTHY MILLER
22 Acting United States Attorney

23 
24 TODD GREENBERG
25 Assistant United States Attorney

26 
27 MATTHEW P. HAMPTON
 Assistant United States Attorney